

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, D.C. 20554

In the Matter of	)	
	)	
<b>HNS License Sub, LLC</b>	)	File Nos. SES-LIC-20150604-00336
	)	SES-LIC-20150604-00337
Application for Earth Station Licenses	)	SES-LIC-20150604-00339
	)	SES-LIC-20150604-00340
	)	SES-LIC-20150604-00342
	)	SES-LIC-20150604-00344
	)	SES-LIC-20150604-00346
	)	SES-LIC-20150604-00347
	)	

**PETITION TO DENY OR DEFER**

On September 16, 2015, the International Bureau released a Public Notice accepting for filing the above-captioned applications (the “Applications”) filed by HNS License Sub, LLC (“HNS”).<sup>1</sup> For the reasons stated below, Iridium Satellite LLC (“Iridium”), by its attorneys, hereby petitions for the Bureau to deny the Applications or defer their processing.

In the Applications, HNS seeks licenses for eight earth stations that will communicate with the Jupiter 97W satellite at 97° W.L. The frequencies on which HNS proposes to operate these earth stations include the 29.25-29.3 GHz band, which Iridium uses for its NGSO MSS feeder links. The rules require HNS to demonstrate in its

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<sup>1</sup> Public Notice, Report No. SES-01782.

Applications that it either has coordinated with Iridium's feeder links or will not cause unacceptable interference to the feeder links.<sup>2</sup>

HNS attempts to satisfy this requirement by stating in the Applications that HNS and Iridium "have concluded a coordination agreement that will ensure the protection of Iridium's operations."<sup>3</sup> But the coordination agreement the parties concluded applies to HNS' originally-proposed 97° W.L. satellite network that was submitted to the ITU by the administration of the United Kingdom, and not its currently-proposed 97° W.L. satellite network that was submitted to the ITU by the administration of Papua New Guinea ("PNG").

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<sup>2</sup> See 47 C.F.R. §§ 25.203(k). See also 47 C.F.R. § 25.258.

<sup>3</sup> Applications, Narrative at 9.

HNS and Iridium are discussing a modified coordination agreement that would apply to the satellite network submitted by PNG, and Iridium is optimistic this modified agreement can be entered into soon. At present, however, there is no coordination agreement covering the point of communication proposed in the Applications. The Bureau should not act on the Applications until a coordination agreement has been concluded.

Respectfully submitted,

**IRIDIUM SATELLITE LLC**

By: /s/ Joseph A. Godles  
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Its Attorneys

October 16, 2015

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing **PETITION TO DENY OR DEFER** was sent via first class mail on this 16th day of October, 2015, to the following:

Jennifer Manner  
HNS License Sub, LLC  
11717 Exploration Lane  
Germantown, Maryland 20876

/s/ Brenda Campbell  
Brenda Campbell